## **Proposed Specific Regulatory Level Chemical Causing Cancer: Glyphosate**

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Subject: GLYPHOSATE NSRL

**Date:** Saturday, June 10, 2017 2:24:22 PM

## **Comment**

Scientists working at the International Agency for Research on Cancer-- headquartered in Lyon, France—analyzed 44 independent research projects published since 1980 and found that people exposed to the weed-killer Glyphosate had double the risk of developing the blood cancer known as non-Hodgkin lymphoma. The study is one of many reliable and independent research projects that links glyphosate to weakened immune systems and the body's inability to fight induced diseases.

The notion that genetically engineered crops would reduce herbicide use has proved to be an empty promise. The U.S. Department of Agriculture recently reported that herbicide use doubled—from 62 million pounds in 1996 to 128 million pounds in 2012. Glyphosate now represents more than 83 percent of the chemical pesticides used in the U.S. annually.

Until comprehensive, independent, and reliable studies of real-life exposure levels are available, there is NO SAFE LEVEL.

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UNESCO'S World Commission on the Ethics of Scientific Knowledge and Technology provides this working definition of the Precautionary Principle

"When human activities may lead to morally unacceptable harm that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. Morally unacceptable harm refers to harm to humans or the environment that is

- threatening to human life or health, or
- · serious and effectively irreversible, or
- · inequitable to present or future generations, or
- · imposed without adequate consideration of the human rights of those affected.

The judgement of plausibility should be grounded in scientific analysis. Analysis should be ongoing so that chosen actions are subject to review. Uncertainty may apply to, but need not be limited to, causality or the bounds of the possible harm. Actions are interventions that are undertaken before harm occurs that seek to avoid or diminish the harm. Actions should be chosen that are proportional to the seriousness of the potential harm, with consideration of their positive and negative consequences, and with an assessment of the moral implications of both action and inaction. The choice of action should be the result of a participatory process." (COMEST, 2005, p. 14.

<u>http://unesdoc.unesco.org/images/0013/001395/139578e.pdfPrecautionary</u> Principle, a working definition)

There is NO SAFE LEVEL.

Thank you for considering this information. I hope that agency deliberations about this issue include consideration of the public health costs of glyphosate-induced diseases.

Respectfully,

Martha Austin

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